

Smucker Quality Beverages, Inc
Chico, California

September 10, 2002

National Organic Standards Board
C/o Toni Strother
USDA/AMS/T&M/NOP
Room 4008 south Ag Stop 0268
1400 Independence Avenue SW.
Washington, DC 20250

Dear NOSB,

Smucker Quality Beverages, Inc. would like to ask the National Organic Standards Board to vote in favor of recommending the use of activated carbon/charcoal as a processing aid under section 205.605 of the National List. We have been purchasing "certified" organic White Grape Concentrate from Canandaigua Concentrates since 1992. All of our products using organic white grape concentrate are labeled "organic" under the category of at least 95% organic ingredients. We have purchased this raw material for the past ten years under a certificate issued by Oregon Tilth Certified Organic. Prior to that we were purchasing certified organic white grape concentrate from Beta Pure Foods.

Our company has been using White Grape Concentrate as our primary sweetener since the inception of our company in 1961. The use of activated carbon as a processing aid has been an allowed practice in the White Grape Juice industry for as long as we have been manufacturing natural fruit juices.

Enclosed you will find general economic data from our company as it relates to the use of activated carbon/charcoal as a processing aid. Without the use of this material a majority of products under the Santa Cruz Organic label, in addition to other brands (see below), as currently formulated would no longer be available to the consumer. The only alternative would be to replace the primary sweetener of organic white grape juice with organic cane sugar. Unfortunately, that is neither a choice that we would like to make nor one we feel our customers would support. Our organic consumers have strongly voiced that they prefer a fruit juice sweetened beverage versus cane juice. Therefore, a formulation change of this magnitude would impact the grape farmers, suppliers of organic white grape concentrate, and Smucker Quality Beverage's potential loss of revenue from decreased sales.

I will formally be recusing myself from the vote of this material at the upcoming September NOSB meeting; however, I will certainly be available to answer any questions you may have.

Sincerely,

Kim Burton
HR & Regulatory Compliance Manager

Smucker Quality Beverages, Inc

Chico, California

Economic/Product Data

- Annual Purchase of Organic White Grape Conc. in excess of \$500,000.00
- Annual Volume of Organic White Grape Conc. in excess of 50,000 gallons
- Products formulated with Organic White Grape Conc.=
 - RW Knudsen Organic Recharge
 - Santa Cruz Organic Lemon Ginger Echinacea
 - Santa Cruz Organic Limeade
 - Santa Cruz Organic Tropical Blend
 - Santa Cruz Organic Carrot Zest
 - Santa Cruz Organic Orange Mango
 - Santa Cruz Organic Peach Nectar
 - Santa Cruz Organic Strawberry Guava Nectar
 - Santa Cruz Organic Hibiscus Cooler
 - Santa Cruz Organic Cherry Nectar
 - Santa Cruz Organic Cranberry Guava Nectar
 - Santa Cruz Organic Hawaiian Ginger Nectar
 - Santa Cruz Organic Pear Nectar
 - Santa Cruz Organic Cranberry Nectar
 - Santa Cruz Organic Papaya Nectar
 - Santa Cruz Organic White Grape Juice
 - After The Fall Organic Orange Pineapple
 - After The Fall Organic Red Tart Cherry
 - After The Fall Tropical Punch

Cc: Dan Vernau – SQB Fruit Procurement Manager
Pete Samuel – SQB Purchasing Manager
Randy Day – SQB Operations Manager
National Organic Program